



Audit Report

District Inspector General for Audit New England District

*Report: 98-BO-209-1005
1998*

Issued: June 9,

TO: Anthony F. Britto, Director, Office of Public Housing, 1APH

FROM: William D. Hartnett, District Inspector General, Office of Audit, 1AGA

SUBJECT: Holyoke Housing Authority
Public Housing Drug Elimination Program (PHDEP)
Holyoke, Massachusetts

We conducted an audit of the Holyoke Housing Authority's (PHA's) Public Housing Drug Elimination Program (PHDEP) for Fiscal Years 1995 through 1997. The purpose of our review was to determine if the PHA administered its PHDEP grants to effectively reduce drug-related crime problems and monitored and reported to HUD the actions/benefits resulting from the grants.

This report contains a finding indicating that the PHA needs to establish a system for measuring and reporting to HUD the effectiveness of its PHDEP program regarding the performance of its Community Policing services and the Holyoke Boys and Girls Club's activities.

The PHA has been provided a copy of this report.

Within 60 days, please provide us a status report on: (1) the corrective action taken; (2) the proposed corrective action and the date to be completed; or (3) why action is not considered necessary. Also, please furnish us copies of any correspondence or directives issued related to this audit

If you have any questions, please contact our office at (617) 565-5259.

Executive Summary

The Holyoke Housing Drug Elimination Program is a combination of Community Policing and Drug Prevention Activities. The PHA drug prevention strategy is a cooperative effort between the Holyoke Police Department, Holyoke Boys and Girls Club, and the PHA for the purpose of developing and improving youth services in PHA developments. Our audit review focused on the implementation and performance of the Holyoke Police Department's (HDP) community policing concept and the Holyoke Boys and Girls Club drug prevention strategy.

Audit Results

The PHA had not effectively evaluated its Program outcomes and did not report them to HUD in Semi Annual Performance Reports for the two year period of PHDEP grants, 1995 and 1996.

The Community Policing calls for additional police services to create drug and crime free environments and to provide protection to the residents in the developments. Our review disclosed that the HPD was not providing daily logs, time sheets and quarterly reports for PHA properties as required. Community Policing has received criticism from PHA officials and residents of public housing regarding the accessibility of police to the residents. As a result of our review, the Community Policing concept is now implemented, administered effectively and accurately reported to ensure program results are consistent with plan objectives. Although, the above conditions are implemented the PHA still needs to establish and implement a system to measure the effectiveness and performance of the program.

The PHA's primarily strategy in Drug Prevention is the opening of the Holyoke's Boys and Girls Club at public housing community centers. The purpose of these Clubs is to provide young people with an opportunity for youth development, tutoring, remediation and recreation. Our review of the Holyoke's Boys and Girls Club disclosed that the sports program has been a great success but there has been little action in providing young people assistance in education, youth development, remediation and other alternative youth services.

Recommendations

We are recommending that PHA establish and implement a system for the tracking and reporting of its PHDEP program regarding the performance of its Community Policing services and the Holyoke's Boys and Girls Club activities. We are also recommending that the PHA establish controls to ensure that all performance reports are accurate, timely and in accordance with HUD regulations.

Findings And Recommendations Discussed

We discussed the finding with the PHA officials during the course of the audit and at an exit conference on February 18, 1998. On May 27, 1998, the PHA provided a response to the finding and recommendations in the draft report. The PHA agreed with the deficiencies cited in the report and described the actions planned to implement each recommendation. We have attached the PHA's comments as an Appendix to the report.

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Abbreviations:

Club	Holyoke Boys and Girls Club
HA	Housing Authority
HPD	Holyoke Police Department
HUD	Housing Urban Development
PHA	Public Housing Authority
PHDEP	Public Housing Drug Elimination Program
PHMAP	Public Housing Management Assessment Program

Introduction

The goals of the PHDEP are to eliminate drug related crimes and problems associated with it; encourage Housing Authorities and Resident Management Corporations to develop a plan to address drugs and other related problems that includes prevention and intervention initiatives. The PHA has targeted 479 Federally-assisted, Low Income Housing units in 3 developments under the Drug Elimination Program. In Fiscal Year 1995, the PHA designated Jackson Parkway and Toepfort Apartments to receive funding for community policing and in Fiscal Year 1996, Lyman Terrace was designated.

This PHA began receiving PHDEP grants in 1995 which has two components: reimbursement of law enforcement for additional security and protective services and drug prevention programs.

The City of Holyoke's Police Department (HPD) entered into a contract with the PHA to open community police Sub-stations for the purpose of staffing three housing authority locations at Jackson Parkway, Toepfort Apartments and Lyman Terrace. HPD is required to provide full time coverage between the hours of 4:00 p.m. and 12: 00 a.m. seven days a week. This coverage is a voluntary tour of duty. During these hours the police are to be completely accessible to residents. This includes patrolling PHA property, opening doors of Sub-stations, and involvement in resident associations. Police officers working the PHA detail are paid on an overtime basis (time and one half).

The PHA entered into a contract with the Holyoke Boys and Girls Club (Club). The Clubs located in the community centers at Jackson Parkway, Toepfort Apartments and Lyman Terrace specialize in a variety of youth alternative services. The Clubs will provide the authority with a concise and comprehensive drug prevention strategy that centers on youth development. The emphasis will be on education, tutoring, remediation and recreation.

For Fiscal Years 95 through 97, the PHA received and disbursed its PHDEP grants as follows:

Awarded by Line Item		Disbursed (as of 2/10/98)	Remaining Balance
FY 1995			
9110 - Law Enforcement	\$162,230	\$162,230	-0-
9160 - Drug Prevention	\$87,770	\$57,770	\$30,000
Sub-totals	\$250,000	\$220,000	\$30,000
FY 1996			
9110 - Law Enforcement	\$142,000	\$79,864	\$62,136
9160 - Drug Prevention	\$105,000	\$25,244	\$79,756
9190 - Other Costs	\$ 3,000	-0-	\$3,000
Sub-totals	\$250,000	\$105,108	\$144,892
FY 1997			
9110 - Law Enforcement	\$100,000	-0-	\$100,000
9160 - Drug Prevention	\$142,700	-0-	\$142,700
Sub-totals	\$242,700	-0-	\$242,700
Totals	\$742,700	\$325,108	\$417,592

For Fiscal Years 95 through 97, the PHA was awarded a total of \$742,700 in PHDEP funds, of which \$404,230 or 54 percent, was for law enforcement. As of February 10, 1998, the PHA spent a total of \$242,094 from FY (s) 95 (\$162,230) and 96 (\$79,864) PHDEP grants to reimburse law enforcement.

Audit Objectives

We limited our review to the PHA's controls and procedures over its implementation of the Program and administration of PHDEP grants awarded for FYs 1995 through 1997 to ensure that applicable Program goals were being achieved in the areas of Law Enforcement and Drug Prevention Programs. Specific audit objectives were to determine whether the PHA:

- Implemented a system for evaluating, monitoring and reporting program outcomes/benefits.

- Prepared and submitted timely and accurate semi-annual Performance Reports to HUD.

Audit Scope and Methodology

- Interviewed PHA staff and the Holyoke Police Department officials regarding the effectiveness of Community Policing; and evaluated administrative practices to determine if the PHA was administering its Drug Elimination Program in an efficient, effective, and economical way.
- Interviewed Patrolmen assigned to Jackson Parkway, Toepfert Apartments and Lyman Terrace regarding their duties and responsibilities as Community Police Officers.
- Made unannounced visits to the Sub-stations to determine if the police officers were on-site, Sub-stations were accessible to the residents, and officers were patrolling housing authority properties.
- Interviewed PHA's Housing Managers and Tenants regarding the operation and effectiveness of community police at the Jackson Parkway and Toepfert Apartments.
- Interviewed Massachusetts State Office, Public Housing Division, Supervisor of Operations, and Functional Specialists to determine what controls the PHA has over administration of its Public Housing Drug Elimination Grants.
- Evaluated programs developed by the PHA to assure that they were implemented, administered effectively and accurately reported to ensure program results are consistent with plan objectives.
- Reviewed HUD's Line of Credit Control System and accounting records to ensure grant disbursements were made in a timely manner.

Audit work was performed from November 1997 through February 1998 and covered the period January 1, 1995 through January 31, 1998 and was extended to include other periods, where appropriate.

We conducted our audit in accordance with generally accepted government auditing standards.

Finding

Finding

The PHA Needs To Establish And Implement Controls Over The Effectiveness And Performance Of Its PHDEP

The PHA does not have a system in place for measuring and reporting to HUD the effectiveness of its PHDEP program regarding the performance of its Community Policing services and the Holyoke's Boys and Girls Club. The PHA staff was unaware of these reporting requirements therefore could not comply with these requirements. As a result, there is not a means for an independent party to measure PHA performance against what the PHA proposed to do in its plan and no assurance that funds expended for PHDEP were used in the most effective manner.

Program Monitoring And Reporting Requirements

HUD requires grantees to provide the local HUD Field Office with a Semi-Annual Performance Report that evaluates the grantee's performance against its plan (24 CFR 961-28 (a)(1)). These reports shall include, in summary form, an explanation of:

- 1) changes in crime statistics;
- 2) completion of any activities;
- 3) problems implementing plan;
- 4) efforts in encouraging resident participation;
- 5) the rate of progress to expectations; and
- 6) any changes to plan to identify resources and number of people involved in the programs and their relations to the plan.

Program Outcomes/Benefits Not Reported to HUD

Our review disclosed that the Semi-Annual Performance Reports (Reports) were not prepared in accordance with HUD requirements. The Semi-Annual Performance Reports contain two components, namely the Outcome Monitoring Section and the Progress Report Narrative. We found that the PHA submitted all four Progress Report Narratives and one Outcome Monitoring Report to HUD for the 1995 PHDEP award and no Outcome Monitoring reports submitted for the 1996 award. These reports are designed to be used by HUD to measure the impact of PHDEP funds on crime rates, resident participation in drug and crime prevention and overall resident and staff satisfaction with local safety.

Our review disclosed that the Narratives did not contain an evaluation of the PHA's performance as compared against its plan; therefore, HUD could not evaluate if the grant was administered in accordance with Program objectives or if desired outcomes were obtained. However, our review disclosed that the former PHDEP Coordinator did report, internally to the PHA, problems with police activity and interaction between police and residents. Our review of these internal reports disclosed that the reports were general in nature and not specific regarding the problems with the Community Policing.

Community Policing Concepts Ineffective

In our interviews with the Housing Managers at Jackson Parkway and Toepfert Apartments the Managers stated that the Community Policing Concept was ineffective in enhancing crime prevention programs, interaction with tenants and police interaction with residents. The officers do not begin their shifts promptly at 4:00 p. m., are not visible and rarely patrol the premises of the housing projects. The Managers reported that they have no control over the officers, do not monitor their patrols or become involved in their specific responsibilities.

The resident leaders at Jackson Parkway and Toepfert Apartments also complained that the officers do not maintain a visible presence making it difficult to develop and maintain a working relationship with them.

Police Not Adhering To Contract

Interviews conducted with the Assistant Executive Director and the Director of Resident Services disclosed that the Holyoke Police Department (HPD) was not adhering to the scope of services as outlined in the 1995 and 1997 HPD contracts. The review disclosed that for the period October 2, 1996, through July 1, 1997, the PHA did not have a contract with the HPD. During this period, the HPD was paid approximately \$14,098 for services. Specifically, workload data for PHA properties, daily logs, timesheets and quarterly reports were not being provided. This information is needed in order for the PHA to report to HUD on the progress and success of the program.

The City of Holyoke's Police Department have since executed a contract with the PHA, on July 31, 1997, for the provision of specific police services associated with the PHA's security programs. Our review of the contract and interviews with Director of Resident Services disclosed concerns regarding the actual performance of the HPD according to their police contract. These provisions are outlined in the scope of services are as follows:

- Two to four officers are to perform specialized patrols in target areas.

Areas to be patrolled and hours to be worked are not stated in the contract. According to Police Officials, this provision was orally communicated to the former PHDEP Coordinator.

- HPD will employ a community policing concept and will assist in developing or enhancing crime prevention programs. At least quarterly, the HPD will meet with PHA representatives and resident leaders to review enforcement and prevention efforts.

The Director of Resident Services stated that, from discussions with resident leaders, the police are not meeting with PHA representatives or resident leaders. Based on our interviews with Police Officials and PHA staff this has been agreed upon but not implemented. Police officials have since been assigned to work with the resident service department to schedule monthly training seminars.

- HPD agreed to collect and provide workload data in public housing developments.

The Director of Resident Services stated that city wide statistics are available but those on housing authority property are not. Therefore, it is difficult to measure the success of the drug elimination program in PHA developments. Police Officials stated that, during our audit period, the HPD utilize a computer to track crimes statistics by sectors which would include the authority's housing developments. Moreover, these crime statistic reports were made available to the PHA but no one from the PHA requested or collected these reports. However, the HPD computer can now track crime statistics such as gang and drug activity, robbery, assault and battery by housing property within each sector.

- HPD will provide housing authority with a minimum of 16 hours of training on community relations and interpersonal communication skills for the officers assigned to the Sub-stations.

The Director of Resident Services stated that the HPD has not provided the PHA any evidence to indicate that the community policing concept (16 hours of training on community relations and interpersonal communication skills) has been provided. Our review disclosed that the HPD is in the process of developing such a program. This concept is an essential provision of the grant. It is the resident interaction with the police that will build confidence in the community policing concept and will make it a success.

- HPD will appoint a Command Officer to act as Administrative Liaison who must prepare Quarterly Reports and evaluation of services under contract.

The Director of Resident Services and the Assistant Executive Director stated that the Quarterly Reports were not performed. HPD officials stated that they met quarterly with PHA staff to orally discuss crime statistics and any other matters concerning community policing. HPD officials stated that the PHA never requested these reports. The Director of resident Services stated that a new Administrative Liaison has been appointed and has taken a pro-active role in the preparation of the Quarterly Reports and evaluation of services.

- HPD must prepare a detail Plan of Operation which should specified the manner and method of performance by which each of the services identified is to be administered.

Our review indicated that one Plan of Operation has been prepared but it did not indicate the manner and method of performance which would identify each of the services to be administered. A new detail Plan of Operation must identify what the police will do while patrolling PHA property. It is imperative that a new Plan of Operation be prepared by HPD to ensure the success of the program.

- HPD will require all assigned police officers to complete a daily log provided by the authority at the conclusion of each shift and forward the original report to the authority's designee. HPD will also provide the authority copies of such incident reports, arrest reports or other public documents which document or substantiate actual or potential criminal activity. Also, the officer assigned to the Sub-station must complete a daily overtime work report.

Our review disclosed that the HPD were not completing the daily log or providing incident or arrest reports to the PHA. As a result of our audit the PHA has designated a Daily Report Form for the community police officers to use to record their activities while on duty at PHA properties. This report outlines the procedures and rules that have to be followed by

the HPD. Both the officer assigned to the Sub-station and his Shift Supervisor must sign and date this report. OIGs unannounced visits to the Sub-stations disclosed that the police were accessible, patrolling and interacting with the residents.

Our review of police billing invoices (November 24, 1997 through January 20, 1998) disclosed that PHA did not pay the HPD approximately \$30,848.00 for Community Policing Services because HPD did not provide overtime work reports to support the payments. Our review of police billing invoices disclosed that the HPD is now providing the PHA's Community Policing Daily Reports, Overtime Work Reports and the Incident Record Reports to the PHA on a weekly basis. Our review disclosed that these invoices had since been paid.

Holyoke Boys and Girls Club Not Adhering To Scope of Services

Our review of the Holyoke Boy's and Girl's Club (Club) contract and interviews conducted with the Director of Resident Services disclosed concerns regarding the actual performance of the Club according to its contract. These provisions as outlined in the Club contract are as follows:

- The Club will provide an on-site Education Coordinator to work with youth in career exploration, tutoring, and remediation.

The Director of Residence Services stated that the on-site centers are to be opened 20 hours per week, 3:30 to 7:30 p.m. The sites are to offer activities that include group clubs, homework help, tutoring, and cultural programs. The Director of Residence Services advised that the club is not holding to the 20 hours per week at all sites and the PHA staff have not witnessed any activities other than sports.

To correct this the PHA will utilize adult resident and youth satisfactory surveys/interviews; feedback for the Boys and Girls Club; Education Coordinator and parents to evaluate and improve the program throughout the year. To accomplish this the PHA now requires the Club to prepare a monthly report. The Club agreed to submit the form to the PHA on a monthly basis along with a calendar of activities for the coming month. This report will allow the PHA to improve and evaluate the effectiveness of the program. The Club has incorporated into its 1997 Drug Elimination Grant a proposal to include a detail scope of services outlining the services and responsibilities that the Club is to provide to the authority. With the appointment of an educational coordinator, outreach worker and youth development worker, the clubs will now be providing youth improvement and educational services .

- The Club will provide an Outreach Worker and a Youth Development worker who will specialize in a variety of youth alternative programs. The Club will provide leadership for a comprehensive sports program which will include basketball, soccer and other physical education activities.

Our review of the monthly Youth Recreation Reports disclosed that the Club is providing the leadership for a comprehensive sports program to include basketball, soccer and other physical education activities. These reports outline in detail the accomplishments of the activities, players who participated and up coming events.

OIG Evaluation

The PHA has taken positive steps to resolve differences over Community Policing and the Holyoke Boys and Girls Club. The PHA needs to establish and implement controls to ensure that it can provide HUD with information on tracking and reporting of crime-related problems in order to measure the effectiveness of its programs against its PHDEP plan.

Recommendations

We recommend that you instruct the PHA to:

- A. Implement a system for evaluating, monitoring and reporting grant outcomes/benefits.
- B. Establish controls to ensure that all Performance Reports are accurate, timely and in accordance with HUD regulations
- C. Establish a new Plan of Operations with the Holyoke Police Department to ensure the success of the program.

Internal Controls

In planning and performing our audit, we considered the internal controls of the Housing Authority of the City of Holyoke, Massachusetts (PHA), specifically for its Public Housing Drug Elimination program (PHDEP), in order to determine our audit procedures and not to provide assurance on internal controls.

Internal Controls consist of a plan of organization and method and procedures adopted by management to ensure that resource use is consistent with laws, regulations, and policies; that resources are safeguarded against waste, loss, and misuse; and that reliable data is obtained, maintained, and fairly disclosed in reports.

Internal Controls Assessed

We determined that the following internal controls were relevant to our audit objectives:

- Controls over the administration and disbursement of grant funds.
- Controls Over Eligibility of program Expenditures.
- Management Controls Over program Performance.
- Controls Over Law Enforcement Activities and the Holyoke Boys and Girls Club.

We assessed all relevant control areas identified above.

Assessment Results

A significant weakness exists if internal controls do not give reasonable assurance that resource used is consistent with laws, regulations, and policies; that resources are safeguarded against waste, loss, and misuse; and that reliable data is obtained, maintained, and fairly disclosed in reports.

Our review disclosed a significant weakness over the PHA's inability to measure and report to HUD actions/benefits resulting from the grants. This weakness is discussed in the Finding section of this report.

Appendices

Appendix 1

Auditee Comments

Appendix 2

Distribution

Assistant Secretary for Public and Indian Housing, P, (Room 4100), (10)
Deputy Assistant for Public and Assisted Housing Programs, PH, (Room 4204)
Deputy Assistant Secretary for Public Housing Investment, PT, (Room 4138), (2)
Director, Office of Capital Improvements, PTC, (Room 4130), (2)
Director, Office of Budget, ARB (Room 4130), (2)
Director, Office of Budget, ARB (Room 3270)
Director, Housing Finance Analysis Division, REF, (Room 8212)
Director, Office of Public Housing, 1APH
Director, Office of Management and Planning, AMM, (Room B-133)
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Mr. Pete Sessions, Government Reform and Oversight Committee, Congress of
the United States, House of Representatives, Washington, DC 20515-4305

The Honorable Fred Thompson, Chairman, Committee on Governmental Affairs,
United States Senate, Washington, DC 20510-6250

The Honorable John Glenn, Ranking Member, Committee on Governmental
Affairs, United States Senate, Washington, DC 20510-6250